Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

In the Matter Of	)	
	)	
Digital Audio Broadcasting Systems	)	MM Docket No. 99-325
And Their Impact On The Terrestrial	)	
Radio Broadcast Service	)	

TO: The Commission

COMMENTS OF NEBRASKA RURAL RADIO ASSOCIATION

The following comments are filed on behalf of Nebraska Rural Radio Association, by Eric F. Brown, PhD, General Manager and Secretary/Treasurer, in response to the Commission's Further Notice of Proposed Rulemaking and Notice of Inquiry in the above captioned matter.

Introduction

Nebraska Rural Radio Association ("NRRA") is a small business which owns six radio stations in rural Nebraska. It is unique among broadcast licensees in the United States: it is a membership organization owned by nearly 4.200 Nebraska farmers and ranchers. NRRA commenced operation more than 50 years ago, as "an agricultural organization, organized and operated exclusively for educational purposes and for the promotion of social and economic welfare in rural areas." Today it serves farmers and ranchers throughout a five-state area, with AM and FM facilities located in central Nebraska (KRVN AM-FM, Lexington), western Nebraska (KNEB AM-FM, Scottsbluff), and eastern Nebraska (KTIC/KWPN-FM, West Point).

NRRA's programming provides an invaluable, irreplaceable service to its rural audience, particularly that which is broadcast on KRVN, a Class II-B station operating with 50kW-U, DA-N. The risk of harm to NRRA's program service from the potential for interference to NRRA's far-flung AM listening audience caused by AM digital transmissions must not be underestimated. NRRA's listeners depend on the stations for 24-hour news, weather, and emergency information. The Great Plains region of the United States suffers uniquely from severe weather and natural disaster hazards. NRRA serves these needs as no other broadcast service can.

Nighttime AM IBOC Operation

NRRA cannot support the introduction of digital radio on the AM band at night unless the hybrid analog/digital systems do not create additional interference to audiences of existing stations. Stations wishing to broadcast IBOC at night should be required to prove there would be no additional interference either co-channel or adjacent channel to the analog station. In order to assure the continued maintenance of existing analog service, the Commission should consider and act upon the following:

- ❖ Current stations are protected from increases at the 25% RSS level by analog stations. All digital signals should be held to the same standards

- ❖ If the NAB's recommendations on IBOC are accepted by the FCC then the Commission will have to determine a definition for "unanticipated interference."

- ❖ Ibiquity's AM Nighttime Compatibility Study suggests that significant interference would be caused outside of a station's Nighttime Interference Free (NIF) limit.[*] This coverage is very important for rural America to receive weather, news, and other emergency information.

[*] "AM Nighttime Compatibility Study Report, Ibiquity Digital Corporation, date May 23, 2003;Field Report-AM IBOC Nighttime Performance, October 20, 2003;Field Report-AM IBOC Nighttime Compatibility, October 31, 2003."

- ❖ It is intuitively obvious that the approach to approve nighttime IBOC and "fix any problems later" is not in the public interest and certainly discriminates against small businesses and low income people in rural America.

- ❖ The market place should decide the rate of adaptation for digital AM radio.

- ❖ Any Commission rule should permit new technology and techniques to further refine IBOC.

Nebraska Rural Radio Association urges the Commission to adopt rules and policy consistent with the foregoing considerations.

Respectfully submitted,

NEBRASKA RURAL RADIO ASSOCIATION

/s/ Eric F. Brown PhD

Eric F. Brown PhD
General Manager

June 10, 2004